

Representing Management Exclusively in Workplace Law and Related Litigation



Jackson Lewis P.C.  
666 Third Avenue  
New York, New York 10017  
Tel 212 545-4000  
Fax 212 972-3213  
www.jacksonlewis.com

ALBANY, NY	GRAND RAPIDS, MI	NAPA, CA	RALEIGH-DURHAM, NC
ALBUQUERQUE, NM	GREENVILLE, SC	NEW ORLEANS, LA	RAPID CITY, SD
ATLANTA, GA	HARTFORD, CT	NEW YORK, NY	RICHMOND, VA
AUSTIN, TX	HOUSTON, TX	NORFOLK, VA	SACRAMENTO, CA
BALTIMORE, MD	INDIANAPOLIS, IN	OMAHA, NE	SAINT LOUIS, MO
BIRMINGHAM, AL	JACKSONVILLE, FL	ORANGE COUNTY, CA	SAN DIEGO, CA
BOSTON, MA	LAS VEGAS, NV	ORLANDO, FL	SAN FRANCISCO, CA
CHICAGO, IL	LONG ISLAND, NY	OVERLAND PARK, KS	SAN JUAN, PR
CINCINNATI, OH	LOS ANGELES, CA	PHILADELPHIA, PA	SEATTLE, WA
CLEVELAND, OH	MEMPHIS, TN	PHOENIX, AZ	STAMFORD, CT
DALLAS, TX	MIAMI, FL	PITTSBURGH, PA	TAMPA, FL
DAYTON, OH	MILWAUKEE, WI	PORTLAND, OR	WASHINGTON, DC REGION
DENVER, CO	MINNEAPOLIS, MN	PORTSMOUTH, NH	WHITE PLAINS, NY
DETROIT, MI	MORRISTOWN, NJ	PROVIDENCE, RI	

DIRECT DIAL: (212) 545-4073

EMAIL ADDRESS: MELLKW@JACKSONLEWIS.COM

February 12, 2015

**VIA ECF**

The Honorable Andrew J. Peck  
United States District Court  
Southern District of New York  
500 Pearl Street  
New York, New York 10007

Re: Ronard Lora and Hugo Rivera v. J.V.  
Car Wash, Ltd. etc.  
Index No. 11 CIV 9010

Dear Magistrate Judge Peck:

We are Special Litigation Counsel to the Chapter 11 Bankruptcy Trustees for the four Car Wash Defendants (J.V. Car Wash, Ltd., Harlem Hand Carwash Corp., Webster Hand Car Wash Corp. and Bayway Hand Car Wash Corp.) and individual Defendant Jose Vasquez in the above referenced matter. As ordered on January 30, 2015 (DKT 134), we submit this letter to provide the Court with an update regarding the status of the parties' discussions regarding Plaintiffs' Counsels' attorneys' fees and costs.

The parties have not agreed upon the amount Plaintiffs' counsel is entitled to receive in attorneys' fees and costs. While the Trustees made a substantial and reasonable offer, we have not received any counter-offer. Accordingly, we understand that Plaintiffs' Counsel will be making an application before Judge Stanton for their attorneys' fees and costs.

Respectfully submitted,

JACKSON LEWIS PC

  
Wendy J. Mellk

cc: Steven Arensen, Esq. (via ECF)  
Laura Longobardi, Esq. (via ECF)